

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS  
PINE BLUFF DIVISION

JANIE R. WAINWIGHT

PLAINTIFF

VS.

CASE NO: 5:12-CV-334-JLH

DAVIS LIFE CARE CENTER

DEFENDANT

**MOTION FOR EXTENSION OF TIME TO FILE RESPONSE AND  
BRIEF TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

Comes now the Plaintiff and moves this Honorable Court for an extension of time to file her response and brief to the Defendants' Motion for Summary Judgment and as the basis for said motion states:

1. That Defendant filed a Motion for Summary Judgment on or about November 27, 2013.
2. That Plaintiff's response and brief are due to be filed in this matter on December 18, 2013.
3. That counsel needs additional time to complete and file said response and brief due to a number of factors since the filing of the Defendants' Motion for Summary Judgment, including but not limited to the preparation of other appellate briefs with the Arkansas Supreme Court and federal court, scheduled court appearances and trials, illness of counsel's paralegal, and the recent inclement winter storm in the Little Rock metropolitan area.

4. That the undersigned is a solo practitioner and this does not have the assistance of other in-house counsel to minimize the workload.

5. The undersigned will not be able to meet the deadline due to other previously scheduled state court appearances, preparation of scheduled criminal trials, other briefs due in the state appellate courts and federal court, of which these dates are running concurrent as a result of the aforementioned in paragraph three herein.

6. The undersigned is very grateful and appreciates the Court for understanding the present conflicts and inclement weather condition.

7. It is expected that the undersigned will be able to complete and file said response and brief with the extension of an additional twenty (20) days.

8. That movant makes this motion in good faith and is not made for the purposes of any delay or other illegitimate purposes.

9. That this motion is in the best interest of justice and will not affect the rights of the parties herein.

10. That on this date, due to the inclement weather, efforts have been unsuccessful in contacting opposing counsel prior to filing this motion.

**WHEREFORE**, the undersigned respectfully requests this Court to grant this motion for an extension of time of twenty (20) days or until January 7, 2014, in which to complete and file Plaintiff's response and brief and for all other proper and just relief.

Respectfully submitted,

/s/Teresa Bloodman  
Teresa Bloodman #2005055  
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**CERTIFICATE OF SERVICE**

I, Teresa Bloodman, do hereby certify that a true and correct copy of the foregoing pleading was electronically filed, this 6th day of December, 2013, with the Clerk of Court using the CM/ECF System, which will send notification of such filing to:

Mr. Spence Robinson, Esq.  
Ramsay, Bridgforth, Robinson and Raley LLP  
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/s/Teresa Bloodman